

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA

vs.

**WILLIAM J. DALLIS,
A/K/A BILL DALLIS**

) CR. NO.: 4:22 cr 579

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18 U.S.C. § 1956(a)(3)

18 U.S.C. § 982(a)(1)

28 U.S.C. § 2461(c)

INDICTMENT

RECEIVED

JUN 29 2022

FLORENCE, S.C.

BACKGROUND

At all times material to this Indictment:

1. **DEFENDANT WILLIAM J. DALLIS, A/K/A BILL DALLIS** resided in the District of South Carolina and was the owner and operator of S & D General Contractors.

2. S & D General Contractors is a general contractor business located in Myrtle Beach, South Carolina, that specializes in designer build services, home construction, remodeling and roofing.

COUNTS 1 THROUGH 6
(Money Laundering)

THE GRAND JURY CHARGES:

3. Paragraphs 1 and 2 of this Indictment are incorporated herein by reference.

4. On or about the dates set forth below, in the District of South Carolina, the Defendant, **WILLIAM J. DALLIS, A/K/A BILL DALLIS**, with the intent to promote the carrying on of specified unlawful activities, and with the intent to conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activities, did knowingly and willfully conduct and attempt to conduct financial transactions affecting interstate commerce as set forth below, each of which involved property

represented to be the proceeds of specified unlawful activities, or property used to conduct or facilitate specified unlawful activities, including using a tunnel or passage that crosses the border between the United States and a neighboring country to smuggle an alien in violation of Title 18, United States Code, Section 555, and bringing in or harboring certain aliens in the United States in violation of Title 8, United States Code, Section 1324, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction was represented to be the proceeds of some form of unlawful activity:

<u>Count</u>	<u>Date</u>	<u>Transaction</u>
1	June 30, 2021	\$50,000 in U.S. currency laundered using a check drawn on a bank account controlled by DEFENDANT DALLIS
2	July 7, 2021	\$100,000 in U.S. currency laundered using a check drawn on a bank account controlled by DEFENDANT DALLIS
3	July 30, 2021	\$100,000 in U.S. currency laundered using a check drawn on a bank account controlled by DEFENDANT DALLIS
4	September 20, 2021	\$110,000 in U.S. currency laundered using a check drawn on a bank account controlled by DEFENDANT DALLIS
5	October 21, 2021	\$100,000 in U.S. currency laundered using a check drawn on a bank account controlled by DEFENDANT DALLIS
6	April 18, 2022	\$100,000 in U.S. currency laundered using a check drawn on a bank account controlled by DEFENDANT DALLIS

All in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and (B).

FORFEITURE**MONEY LAUNDERING:**

Upon conviction for violation of Title 18, United States Code, Section 1956 as charged in this Indictment, the Defendant, **WILLIAM J. DALLIS, A/K/A BILL DALLIS**, shall forfeit to the United States any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, as charged in the Indictment, or any property traceable to the offenses.

PROPERTY:

Pursuant to Title 18, United States Code, Section 982(a)(1), and Title 28, United States Code, Section 2461(c), the property subject to forfeiture includes, but is not limited to, the following:

A. **Money Laundering/Forfeiture Judgment:**

A sum of money equal to all property involved in the money laundering offenses charged in the Indictment, and all interest and proceeds traceable thereto, for which the Defendant is liable as the result of his violation of 18 U.S.C. § 1956.

B. **Bank Accounts:**

- (1) \$59,342.25, representing funds contained in Wells Fargo Business Checking Account
Account Number: x6300
In the name of: S and D SC Holdings, LLC
Asset ID: 22-FBI-004360
- (2) \$11,967.99, representing funds contained in Wells Fargo Business Choice Checking Account
Account Number: x6318
In the name of: S and D SC Holdings, LLC
Asset ID: 22-FBI-004361

- (3) \$962.39, representing funds contained in Wells Fargo Business Choice Checking Account
Account Number: x6359
In the name of: S and D SC Holdings, LLC
Asset ID: 22-FBI-004363
- (4) \$3,443.71, representing funds contained in Wells Fargo Business Choice Checking Account
Account Number: x2895
In the name of: S and D SC Holdings, LLC
Asset ID: 22-FBI-004362

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

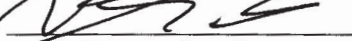
it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendant up to the value of the forfeitable property;

Pursuant to Title 18, United States Code, Section 982(a)(1), and Title 28, United States Code, Section 2461(c).

A True BILL


~~COREY~~ PERSON

COREY F. ELLIS
UNITED STATES ATTORNEY

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